

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

\_\_\_\_\_  
**Murad Abdul Qayyum**  
\_\_\_\_\_

\_\_\_\_\_  
*(In the space above enter the full name(s) of the plaintiff(s).)*  
\_\_\_\_\_

- against -

\_\_\_\_\_  
**Rex W. Tillerson**  
\_\_\_\_\_

\_\_\_\_\_  
**Alicia Frechette**  
\_\_\_\_\_

\_\_\_\_\_  
**Steve Brda**  
\_\_\_\_\_

\_\_\_\_\_  
**Steve Foster**  
\_\_\_\_\_

\_\_\_\_\_  
**Stacey Price**  
\_\_\_\_\_

*(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)*

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

**Murad A. Qayyum**

**68 Longfield Drive**

**Hillsborough NJ 08844**

**(908) 392 - 6936**

RECEIVED

SEP 05 2017

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH  
CLERK

**COMPLAINT**

Jury Trial: ☒ Yes ☐ No  
(check one)

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1      Name Alicia Frechette  
                                  Street Address U.S. Department of State  
                                  County, City Office of the Legal Adviser, SA-17  
                                  State & Zip Code 600 19<sup>th</sup> Street, NW, Suite 5.600  
                                  Washington, DC 20522

Defendant No. 2      Name Steve Brda  
                                  Street Address U.S. Department of State  
                                  County, City Office of the Legal Adviser, SA-17  
                                  State & Zip Code 600 19<sup>th</sup> Street, NW, Suite 5.600  
                                  Washington, DC 20522

Defendant No. 3      Name Steve Foster  
                                  Street Address U.S. Department of State  
                                  County, City Office of the Legal Adviser, SA-17  
                                  State & Zip Code 600 19<sup>th</sup> Street, NW, Suite 5.600  
                                  Washington DC 20522

Defendant No. 4      Name Stacey Price  
                                  Street Address Scientific Research Corporation  
                                  County, City 2300 Windy Ridge Parkway  
                                  State & Zip Code Suite 400 South  
                                  Atlanta, GA 30339-8431

770-859-9161

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal Questions

☐ Diversity of Citizenship

☐ U.S. Government Plaintiff

☒ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New Jersey (NJ)

Defendant(s) state(s) of citizenship District of Columbia (DC)

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? United States Consulate - Karachi Pakistan

B. What date and approximate time did the events giving rise to your claim(s) occur? October 2015 to September 7, 2016

C. Facts: \_\_\_\_\_

What  
happened  
to you?

The complainant was assigned as Civil Engineer on DOS/OBO construction project in US Consulate Karachi Pakistan. The duration of the contract employment was for 18-months. The DOS/OBO project director and construction manager wrongfully terminated the contract employment after 11-months and 7-days.

Who did  
what?

The on site DOS/OBO Project Director (Steve Brda) and Construction Manager (Steve Foster) created hostile working environment, threatened the complainant to send him back to the United States, by pass the DOS/OBO rules & policies and specifically stop the complainant not to attend the Town Hall Meetings and ignored the rules for debriefing before employment termination.

Was  
anyone  
else  
involved?

The complainant pointed out irregularities in the construction contract. The DOS/OBO on site Project Director & Construction Manager was involved socializing with the general contractor, bribing & kickbacks and forced the complainant to sign the contractor's documents as witnessed. The complainant was determined to report to DOS/OIG.

Who else  
saw what  
happened?

The SRC Inc. employee Stacey Price was also involved to support the OBO project director and to terminate the complainant's employment wrongfully.

Nisar Alvi, James Benson and Matt Hamersville were involved and witnessed the entire situation. All including the complainant were the employee of SRC Inc.

**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. \_\_\_\_\_

None!

Not Applicable

**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

**Financial Damages**

Following is the summary of financial damages due to wrongful termination of contract employment and illegal act of the client (DOS/OBO) and the employer (SRC INC.).

1.	Annual Base Salary as per employment agreement	\$100,008.00
2.	Hardship pay on base salary	\$30%
3.	Danger Pay on base salary	\$35%
4.	Housing allowance per month	\$4,000.00
5.	Lost base salary (6-months & 15-days)	\$54,171.00
6.	Lost hardship pay (30% on base salary)	\$16,251.30
7.	Lost danger pay (35% on base pay)	\$18,959.85
8.	Lost apartment security & households	\$8,850.00
9.	Lost follow on assignments (3-years x \$150,000)	\$450,000.00
10	Emotional distress due to illegal act.	\$150,000.00

**Total Claim: \$698,232.00**

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 4 day of September, 2017.

Signature of Plaintiff



Mailing Address

68 Longfield Drive  
Hillsborough NJ 08844

Telephone Number

908-392-6936

Fax Number (if you have one)

E-mail Address murad99@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff

